

# EXHIBIT 6

**From:** [Zhu, Michelle J.](#)  
**To:** [rak\\_headwater@raklaw.com](mailto:rak_headwater@raklaw.com)  
**Cc:** \*\*\* [GDCTMO-Headwater](#)  
**Subject:** RE: Headwater v. T-Mobile - Infringement Contentions  
**Date:** Tuesday, March 19, 2024 9:44:00 AM

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Counsel,

Headwater's infringement contentions remain deficient, as per our prior correspondence from February 1, 2024. *See* 2024-02-01 K. Dominguez Ltr. Having not received any amended contentions, T-Mobile understands Headwater's infringement allegations to be limited to the accused end-user devices and functionality, *i.e.*, the specifically identified "phones, tablets, wearables, [or] devices . . . for use with T-Mobile's wireless network services," and will carry out its discovery obligations consistent with that understanding.

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**From:** Zhu, Michelle J.  
**Sent:** Monday, February 26, 2024 5:21 PM  
**To:** [rak\\_headwater@raklaw.com](mailto:rak_headwater@raklaw.com)  
**Cc:** \*\*\* [GDCTMO-Headwater](#) <[GDCTMO-Headwater@gibsondunn.com](mailto:GDCTMO-Headwater@gibsondunn.com)>  
**Subject:** Headwater v. T-Mobile - Infringement Contentions

Counsel,

In light of the parties' agreement to not oppose each other's motions for leave to amend, please provide your proposed amended infringement contentions for the T-Mobile case. Since you did not indicate otherwise on our meet and confer, we assume the amendment for T-Mobile will mirror the amendment served on Verizon.

Please direct all correspondence to our team email reflector going forward: [GDCTMO-Headwater@gibsondunn.com](mailto:GDCTMO-Headwater@gibsondunn.com). Thank you.

**Michelle J. Zhu**  
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